

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division**

KEVIN REAGAN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 4:23-cv-158
)	
WILLIAM J. BURNS, Director,)	
Central Intelligence Agency,)	
)	
Defendant.)	
_____)	

PLAINTIFF’S OPPOSITION TO DEFENDANT’S MOTION TO DISMISS

Plaintiff Kevin Reagan, by and through undersigned counsel, hereby opposes Defendant’s Motion to Dismiss Plaintiff’s Complaint (Dkt. 44) and requests that this Court deny Defendant’s Motion in its entirety, for the reasons articulated in Plaintiff’s Memorandum of Points and Authorities in Opposition to Defendant’s Motion to Dismiss, which is attached hereto and incorporated herewith.

Dated: October 28, 2024¹

Respectfully submitted,

/s/ LENORE C. GARON

LENORE C. GARON

VSB # 39934

Law Office of Lenore C. Garon, PLLC

2412 Falls Place Court

Falls Church, VA 22043

Phone: 703-534-6662

Fax: 703-534-4448

lenore@lenorecgaron.com

¹ This Opposition and the accompanying Memorandum in Support thereof were submitted to the PCRB on October 11, 2024, as required by the Court’s Order of September 25, 2024 (Dkt. 50). On October 28, 2024, the PCRB informed Plaintiff’s counsel that Plaintiff’s Opposition and the Memorandum in Support thereof contain no classified information and may be filed without revision. Thus, Plaintiff is hereby filing his Opposition and Memorandum in Support which were submitted to the PCRB on October 11, 2024.

Attorney for Plaintiff

/s/ DANIEL K. GEBHARDT
DANIEL K. GEBHARDT
Admitted Pro Hac Vice
(D.C. Bar No. 975703)
Solomon Law Firm, PLLC
1025 Connecticut Avenue, N.W.
Suite 1000
Washington, DC 20036
Phone: 866-833-3529
Fax: 202-688-1896
dgebhardt@fedemploylaw.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiff's Opposition to Defendant's Motion to Dismiss, and a proposed order, was served on this 28th day of October 2024 via electronic filing using this Court's CM/ECF system, on Defendant:

Daniel P. Shean, Assistant U.S. Attorney
Virginia State Bar No. 84432
Counsel for Defendant
Office of the United States Attorney
101 West Main Street, Suite 8000
Norfolk, Virginia 23510-1671

Email: daniel.shean@usdoj.gov

/s/ Lenore C. Garon
Lenore C. Garon